

CGB-CC-0487

PASTOR SHANE
AND LISA PHILPOTT



SERVICE SCHEDULE:
SUNDAYS AT 10:30 AM
WEDNESDAYS AT 7:00 PM

BREAKFAST CLUB:
SUNDAYS FROM
9:00 TO 10:00 AM

THE EDGE YOUTH CENTER:
WEDNESDAYS FROM
7:00 TO 8:00 PM

1181-15TH ST STREET SW • MASON CITY, IOWA 50401 • PHONE: 641-423-XXXX • FAX: 641-422-0767

Received & Inspected

JAN 23 2012

FCC Mail Room

January 4, 2012

Office Of The Secretary
Federal Communications Commission
Attention: Disability Rights Office, Room 3-B431
445 12th Street, SW
Washington, DC 20554

Re: CG Docket No. 06-181; Case Identifier No. CGB-CC-0487

I. Documentation Of Funds Available For Programming

- A. Costs associated with "Faith In Action" programming:
 - a. \$55,000.00 for one year (52 weeks) of programming.
 - b. Please find enclosed documentation of funds allocated to the operating budget of "Faith In Action."
- B. Financial Resources:
 - a. Christian Fellowship Church is a non-profit organization receiving its income strictly from congregational contributions.
 - b. We began airing "Faith In Action" in April of 2006. Since that time, we have received little or no financial support for our television outreach. We are operating on the same income we have been operating on for years (adjusted for normal inflation), but our expenses have dramatically increased due to production costs and airtime costs for "Faith In Action."

II. The Nature And Cost of Closed Captioning

- A. Quotes of competitive pricing from closed captioning companies:
 - a. CaptionMax: \$200.00 minimum fee per 30 minute program. Transcription fees not included.
 - b. Dynamic Captioning: \$165.00 minimum fee per 30 minute program. Transcription fees not included.
 - c. East Texas Captioning: \$150.00 minimum fee per 30 minute program. Transcription fees not included.
 - d. Video Caption Corporation: \$235.00 minimum fee per 30 minute program. Transcription fees included.
 - e. VITAC: \$125.00 minimum fee per 30 minute program.
- B. Correspondence received from captioning companies:
 - a. Please find enclosed with this document numerous quotes from various local and national companies indicating a wide range of captioning prices.
 - b. All quotes referred to above were obtained within 30 days of this petition.
- C. Sponsorship and closed captioning assistance:
 - a. Please find enclosed a letter from our video programming distributor, KIMT-TV3, stating that they do not offer any financial assistance for closed captioning at this time.
 - b. We have sought after and have been denied sponsorship for "Faith In Action." Please see the enclosed documentation.
 - c. As a Christian program, we need to be extremely careful about who we allow to sponsor our program. In addition to that, it is impossible to know if our sponsor was conducting their business or themselves in a way that lines up with what we believe and preach every week on our television program.

III. The Impact On The Operation Of The Provider Or Program

- A. Christian Fellowship Church does not have closed captioning equipment, or the resources available to purchase this equipment. We would be required to send our programs to an outside source for captioning. This would cause severe delays in how quickly we could air our program. Currently, we film our segment no earlier than one - four days before our deadline. We have just enough time to edit our program and deliver it to KIMT-TV3 for airing without missing our deadline. Closed captioning our program would delay this process considerably, and would require us to air material weeks after it was filmed, in which case the material is usually already outdated or irrelevant.
- B. Furthermore, the added production costs of closed captioning "Faith In Action" would make the program unaffordable. The costs for closed captioning would more than double the costs of our programming. Christian Fellowship Church would be forced to discontinue programming and cease broadcast operations.
- C. If our program were to be closed captioned by an outside source, it would need to be viewed by our staff before airing to make sure there were no errors in typing. We have witnessed on television many times where words were left out, place out of order, or in the worse possible case, a word was misspelled and then resembled a "curse word". An error of this magnitude would devastate all that "Faith In Action" is trying to accomplish. Our staff members do not have the time available to preview every program after captioning, not to mention this would add more delay to the airing of our program.

IV. The Type Of Operation Of The Provider Or Program Owner

- A. "Faith In Action" is an outreach ministry of Christian Fellowship Church whose main purpose is to share the abundant life we have through Jesus Christ with our local community.
- B. Christian Fellowship Church is a non-profit organization whose income comes strictly from congregational contributions.

V. Conclusion

- A. We applied for closed captioning exemption before we ever began airing "Faith In Action". If we had been denied the exemption and been required to close caption our program, we never would have began airing "Faith In Action" on television.
- B. We have been airing "Faith In Action" on KIMT-TV3 for over five years. In that time, neither Christian Fellowship Church nor KIMT-TV3 have received any complaints about program not being closed captioned.
- C. In the years that we have been on the air, we have gained numerous followers. Many of these people consider this their church, whether they are able to attend or not. There are countless disabled persons who cannot leave their homes or nursing home in order to attend church. Watching "Faith In Action" is the only church these people are able to experience. Although we are sympathetic to the hearing impaired, we are also concerned about the thousands of people who are not mobile enough to make it to a church service.
- D. For the reasons discussed above, we ask that the Federal Communications Commission uphold the exemption that was granted to us on the basis of the "undue burden" standard, 47 C.F.R. § 79.1(f). We are extremely grateful for this exemption. It has allowed us to reach thousands of people in our local area with the Good News about Jesus Christ for over five years now. This is something that has never been accomplished in this region, and it has been made possible solely through the giving of Christian Fellowship Church's congregation members, and through the exemption that was granted to us by the Federal Communications Commission.

We appreciate the time you have given to this matter. If you have any questions or concerns please feel free to contact us at:

Christian Fellowship Church
1181 15th Street SW
Mason City, IA 50401
(641) 423-0000

Sincerely,

Pastor Shane Philpott
President

PASTOR SHANE
AND LISA PHILPOTT



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January 4, 2012

Office Of The Secretary
Federal Communications Commission
Attention: Disability Rights Office, Room 3-B431
445 12th Street, SW
Washington, DC 20554

Re: CG Docket No. 06-181; Case Identifier No. CGB-CC-0487

To Whom It May Concern,

The current programming costs for "Faith In Action" are \$55,000.00.

The 2011 income for this project was \$55,427.22.

The costs for closed captioning, if imposed, would be \$10,400.00 conservatively.

The total cost for "Faith In Action" would then be \$65,400.00.

This would cause us to cease operations and discontinue our program.

We appreciate the time you have given to this matter. If you have any questions or concerns please feel free to contact us at:

Christian Fellowship Church
1181 15th Street SW
Mason City, IA 50401
(641) 423-0000

Sincerely,

Pastor Shane Philpott
President

captionmax



January 3, 2012

Attn: Kallie Cooper
Christian Fellowship Church
via email: kcooper@cf-church.org

Dear Kallie,

Thank you for contacting CaptionMax about captioning your half-hour program.
Please see below for a breakdown of workflows and related costs:

1) We ONLY email a caption file to you, which you in turn provide to a post production/dubbing facility who will output to tape or DVD for you.

Per half-hour program:

You provide us with a reference video

http://captionmax.com/structure/resources/reference_video_specs.pdf which can be a DVD mailed to our office or a video uploaded to our website.

Depending on your final distribution method, we either email a .cap for output to tape or a .scc for output to DVD.

\$200: creation of roll-up style caption file **OR** \$300: creation of pop-on style caption file

Please allow us 2-3 business days from receipt of your reference video.

2) We create the caption file and output to tape to provide you with a captioned master tape.

Per half-hour program:

You provide us with a copy of your master video

http://captionmax.com/structure/resources/master_video_specs.pdf shipped to our office.

\$200: creation of roll-up style caption file **OR** \$300: creation of pop-on style caption file

PLUS

\$95: output to any SD tape format (digibeta, BetaSP, DVCPro, etc.)

Please allow us 3-4 business days from receipt of your video.

3) We create the caption file and output to DVD to provide you with a captioned DVD-R.

Per half-hour program:

You provide us with a copy of your DVD assets

http://captionmax.com/structure/resources/reference_video_specs.pdf.

\$200: creation of roll-up style caption file **OR** \$300: creation of pop-on style caption file

PLUS

\$150: autoplay DVD, no menu or chapters

OR

\$250: DVD with menu and chapters

Please allow us 5-7 business days from receipt of your video.

Please feel free to contact me with any questions.

captionmax



Thank you,

MB Hannah

Maridelle Hannah
Business Development Manager
818-295-6372 direct
maridelle@captionmax.com

Closed Captioning Service Proposal

Christian Fellowship Church

1181 15th Street SW
Mason City, IA 50401

Telephone: 641-423-0000

Attn: Ms. Kelly Cooper
kcooper@cf-church.org



Composed by: *Craig Wilson*
President
January 3, 2012

**** Proposal valid for 90 days and guaranteed for 1 year from date of service activation ****

Offline Service Rates

Program Length	English - English Offline Captioning	
	Pop-On	Rollup
30 Minutes	\$230	\$165

**** Verbatim musical lyrics to be provided by client to Dynamic to insure accuracy****

Program Title: ***"Faith in Action"***

Program Length: 30 minutes

Episodes: Weekly

- **Caption Style:** TBD (Pop-On or Rollup)
- **Positioning:** 2 lines at the bottom of the screen.
- **Deliverable File Format:** TBD (see attached option menu).
- **File Transfer:** Via FTP client folder.
- **Final Cut Video Files:** To be uploaded to FTP Client folder as low resolution Windows Media or Quick Time with time code burn in.
- **(cc) File Delivery:** 3 business days (M-F) from receipt of video file from client, provided weekly scheduled service is established.
- **Payment Terms:** Net 30 days.

Captioning file formats that we can import and export:

Word Processor Group

1. ASCII Text File (*.txt)
2. Word Document (*.doc)
3. WordPerfect Document (*.wpd, *.doc)
4. Rich Text Edit File (*.rtf)

Caption Formatted Group

1. Caption Center File (*.tds)
2. Captions Inc. File (*.cin)
3. Cheetah Caption File (*.asc & *.cap) (Export to *.cap not available)
4. DOS CPC-600/CPC-700 File (*.*)
5. DVD Caption File (*.cc, *.scc)
6. CCaption (*.onl)
7. Power Pixel Format File (*.txt)
8. Softni (*.sub)
9. Ultech DV-2000 (*.onl, *.ult)
10. Windows CaptionMaker File (*.cap)
11. Windows CaptionMaker File ver 1.xx (*.cap)

DVD/DV2000/Webcast Subtitle Group (TIF file formats cannot be imported)

1. Adobe Encore (*.txt)
2. Daikin Scenerist TIF (*.zip)
3. Daikin Scenarist Text (*.txt)
4. DV2000 USF/UYC (*.zip) \5. Sonic Solutions TIF (*.zip)
6. Sonic Solutions Text (*.txt)
7. Spruce DVDMaestro TIF (*.zip)
8. Spruce STL Script File (*.stl)
9. Webcast SMI/RT (*.zip)
10. Google/YouTube (*.srt)

Encoding capabilities:

SD Formats:

1. VHS
2. BetaSP
3. DigiBeta

HD Format:

1. HDCam

We can encode/dub between any of the above formats, with the exception of DVD.

We can upconvert from any of the SD formats to our HD formats. The options for upconversion are:

- Stretch (pulls the 4:3 material to 16:9)
- Letterbox (Keeps 4:3 ratio)
- Wide (crops the bottom and top of the SD signal to keep a 16:9 frame, fills full HD frame)

We can also down convert from our HD formats to the SD formats. The options for downconversion are:

- Crop (crops the left and right edges of the HD signal to fit the 4:3 SD signal)
- Letterbox (keeps the 16x9 aspect and shrinks full HD frame to fit in 4:3 SD frame)

East Texas Captioning

Tyler, Texas
Phone: 903.216.2216
E-Mail: roy@easttexascaptioning.net
Web: www.EastTexasCaptioning.net

This quote has been prepared for Christian Fellowship Church.
These prices are for a 30 minute broadcast.

Option 1 – Standard workflow | \$150.00

This includes transcription, time stamping and one Beta SP Master (shipping not included). You send us an audio master. We transcribe and timestamp it. You then send us a broadcast quality master of the video. This can be shipped to us on a Jump Drive, Data DVD (Standard Definition Only), or Beta SP Tape. We re-master it with closed captioning and send it to the location of your choice.

Option 2 – Tapeless workflow | \$100.00

This includes transcription and time stamping. You send us an audio master of the broadcast. This can be done by ftp or email. We can provide a service for sending us larger file sizes at no additional charge to you. We would then email you a time stamped video data file in the QuickTime or AVI format. Your editor would place this file on a 2nd video track in the editing system.

Option 3 – Tapeless workflow, Transcription done In-House | \$75.00

You transcribe the broadcast using one of two possible software programs. We can provide you with referrals on transcription software. One we sell and one we don't. Both work equally well. Expect the software to cost about \$120.00 and please know that this is a one-time fee. After transcribing the broadcast you can email us the project file. We would then email you a time stamped video data file in the QuickTime or AVI format. Your editor would place this file on a 2nd video track in the editing system.

Option 4 – Tapeless workflow, Transcription & Time Stamping done In-House | \$50.00

You transcribe the broadcast and you time stamp it. This is quite possibly the most cost effective solution available anywhere. At least I've not seen this option offered by any other company. This would be done with a software program we sell. Again, expect it to cost around \$120.00. You email us the finished project file. We can then convert the file into any type of closed captioning file you need. This includes High Definition, YouTube, H.264 and virtually every other format that is being used at this time.

Roy Keiningham
Owner – East Texas Captioning



VIDEO CAPTION CORPORATION

DATE: January 3, 2012
TO: Kallie Cooper / Christian Fellowship Church
FROM: Constance Carlson / Video Caption Corporation
RE: Closed Captioning Proposal

Dear Kallie:

Video Caption Corporation appreciates the opportunity to submit this proposal to close caption programming for the Christian Fellowship Church.

We propose providing our high-quality Basic Roll-up Style captioning for your periodic, 30-minute programs, which you would send to us on miniDV. Our deliverable to you would be Closed Caption Masters encoded to DVCPR025.

Pricing (per 30-minute Show)

***Basic Roll-up Style Closed Captioning*.....\$235.00**

***Transcription*.....Included**

***Encoding to DVCPR025*.....Included**

Price includes transcription, captioning, encoding, and tape stock. Our standard guaranteed turnaround for this project is 3 business days. Faster turnarounds, including same day, are available at additional charge. As a "regular client," we would waive rush fees for your occasional need of a 2-day turnaround and significantly discount our fees for faster turnarounds and other services!

Shipping and handling of your masters and Closed Caption Masters are additional.

Kallie, please know that we guarantee that our captioning will be 100% accurate and perfectly timed to your video!

We also will always do our very best to make this process as easy and affordable as we can. If you have any questions or concerns, please do not hesitate to contact me at any time.

We look forward to the opportunity of working with you!

Sincerely,

A handwritten signature in black ink, appearing to read 'Cc', with a stylized flourish at the end.

Constance Carlson
Video Caption Corporation

Contact Information

I am available if you have any questions about this proposal. Please contact me anytime.

Telephone: (800) 705-1204
Facsimile: (800) 705-1207
Email: ccarlson@vicaps.com
Website: www.vicaps.com



CAPTIONING. DONE. RIGHT.

Heather York
VP, Marketing
1325 G Street NW
Washington DC 20005

November 11, 2011

Cj Eggerth
Secretary
Christian Fellowship Church
1181 15th Street SW
Mason City, IA 50401

Ms. Eggerth:

It was a pleasure speaking with you yesterday! Please accept this document as VITAC's quotation to provide captioning services for the Christian Fellowship Church. The captioning is as follows:

1. You upload a proxy of your final video to our FTP site. VITAC accepts just about any video format. You may find our preferred specifications here: http://www.vitac.com/files/pdf/VITAC_VIDEO_SPECS_r1_08-2011.pdf
2. We will create a 100% accurate, roll-up style caption file – transcribing the video, breaking the transcript into captions and then timing and placing those captions so that they appear in sync with audio.
3. Finally, we will export our file into the format which works best with your editing system – normally SCC format.

Our standard turnaround for a one-hour program is 2-3 business days.

The total charge to create the captions will be \$125 per 30:00 program.

To get started, please contact me or our client services department at clientservices@vitac.com, 724-514-4077. We'll set you up with an account, a secure FTP login and password, and a schedule. Our client services department is available 9:00 a.m. to 11:00 pm, Monday-Friday, and captioners and supervisors are on staff 24/7.

We look forward to the opportunity to work with you in the near future! Please let me know if I may provide further details.

Sincerely,

Heather York
VP, Marketing
VITAC
301-881-7534
Heather-y@vitac.com



November 29, 2011

The Reverend Shane Philpott
President
1151 – 15th Street, SW
Mason City, IA 50401

Pastor Philpott:

I understand Christian Fellowship Church may be required to caption previously exempt television programming as the result of recent FCC action. I'm writing to offer creative captioning solutions at special rates from the nation's leading closed captioning company, VITAC. These solutions include:

CAPTIONS FORMATTED FOR YOUR EDITING SYSTEM

Easy and 100% accurate, VITAC will create a caption file that is formatted to work with your nonlinear editing system (.aaf for Avid HD or SD or .scc for Final Cut). Simply upload a low-resolution proxy of your video to our secure FTP site. We will create your caption file and deliver within 2-3 business days. You then lay the caption file into your video timeline and export a captioned video. The total charge to create the captions this way is **\$250 per 60:00 program, \$125 per 30:00 program.**

WEEKDAY LIVE CAPTIONING

VITAC captions 190,000 hours of live programming per year, most of it airing in the morning, evenings and weekends. We're offering a discount to organizations with the ability to encode captions live to tape, between 9:00 a.m. and 6:00 p.m. EST, Monday through Friday. If you have your own caption encoder and the ability to feed us audio, contact us to learn more about this option, which costs **\$110 per 60:00 program, \$55 per 30:00 program.**

TURNKEY LIVE TO TAPE

Don't have an encoder or editing system? Don't worry! VITAC will accept your video in any format and add live-to tape captions ourselves. We'll ship back a captioned master within two days of receipt of the video. This option will cost **\$230 per 60:00 for SD videotape, \$115 per 30:00, plus shipping.**

VITAC also offers additional "no worries" solutions including tapeless file delivery with embedded captions. Popular file formats include MXF, QuickTime, MPEG2 Transport and Program streams.

To learn more, please contact VITAC's Client Sales & Services department at clientservices@vitac.com or call 724-514-4077. Please mention our "**Anglers Order Special.**" We look forward to the opportunity to work with you in the near future!

Sincerely,

A handwritten signature in cursive script that reads "Heather York".

Heather York
VP, Marketing
301-881-7534
Heather-y@vitac.com

101 Hillpointe Drive | Canonsburg, PA 15317 | Phone 724.514.4000 | Fax 724.514.4111
4605 Lankershim Boulevard, Suite 250 | North Hollywood, CA 91602 | Phone 818.755.0410 | Fax 818.755.0411
1501 Wilson Boulevard, Suite 1003 | Arlington, VA 22209 | Phone 703.807.2766 | Fax 703.807.2761



112 North Pennsylvania Ave.

Mason City, Iowa 50401

641.423.2540 (P)

January 11, 2012

To Whom It May Concern,

KIMT does not provide Closed Captioning services to advertisers or clients. KIMT only provides captioning for KIMT produced programming. KIMT is not the producer of Faith in Action.

Sincerely,

A handwritten signature in cursive script, reading "Jerome R. Risting". The signature is written in dark ink and is positioned below the word "Sincerely,".

**Jerome Risting
Marketing/Programming Director**



Rev. Shane Philpott
Shane Philpott Ministries
1181 15th Street SW
Mason City, IA 50401

Re: Closed Captioning Sponsorship for "Faith In Action" programming

Dear Rev. Shane Philpott,

I want to thank you for your letter requesting a sponsorship for the closed captioning for "Faith In Action." It is with regret that we are unable to assist you with your recent request for sponsorship for your program. Whilst we recognize and appreciate the value and importance of such a program in our area, our budget for corporate giving has already been expended.

Please do not hesitate to contact us in the future. We do wish the best for you and your endeavors and hope to be able to assist you in the future.

Sincerely,

Timothy J. Ihlenfeldt

Tim Ihlenfeldt
President of Tim Ihlenfeldt Agency, Inc.

Charlie's Auto Repair

818 South Federal Avenue
Mason City, IA 50401

Phone Number: (641) 424-5655
Fax Number: (641) 380-0338

Rev. Shane Philpott
Shane Philpott Ministries
1181 15th Street SW
Mason City, IA 50401

Re: Faith In Action Sponsorship

Dear Rev. Shane Philpott,

Thank you for considering us a worthy sponsor of "Faith In Action." Although we try to sponsor genuine causes such as yours, I regret that our financial position at this moment precludes us from supporting your program.

Our company appreciates the importance of corporate giving, particularly to an organization such as yours, and we would be honored to be considered again in the future.

Sincerely,

A handwritten signature in black ink, appearing to read 'Charlie West', with a stylized flourish at the end.

Charlie West
Charlie's Auto Repair